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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VINCENT ISMAEL,

Plaintiff,

vs.

PORTFOLIO RECOVERY ASSOCIATES,
LLC and RAUSCH STURM LLP,

Defendants.

CASE NO. 2:22-cv-00209-JAD-VCF

**STIPULATION AND ORDER
TO EXTEND TIME TO FILE
RESPONSE TO COMPLAINT**

(Second Request)

Pursuant to Local Rule IA 6-1, Defendant Portfolio Recovery Associates, LLC (“PRA”) by and through its attorney, Lori N. Brown of Gordon Rees Scully Mansukhani, LLP and Plaintiff Vincent Ismael, by and through his attorneys Gustavo Ponce and Mona Amini of Kazerouni Law Group, hereby stipulate and agree as follows:

1. Plaintiff filed his Complaint on February 3, 2022.
2. PRA was served with the summons and complaint on February 11, 2022.
3. PRA’s responsive pleading is currently due April 4, 2022.
4. PRA requests additional time to file its response to the Complaint up to and including April 18, 2022.
5. Plaintiff does not oppose the requested extension.
6. The extension, which is PRA’s second requested extension, will allow PRA and Plaintiff to continue exploring possible early resolution without incurring unnecessary fees and costs.

8. Accordingly, PRA will file its responsive pleading to Plaintiff's Complaint on or before April 18, 2022.

DATED this 1st day of April, 2022.

By: /s/ Lori N. Brown
Lori N. Brown
Attorneys for Defendant
Portfolio Recovery Associates, LLC

By: /s/ Gustavo Ponce (with permission)
Gustavo Ponce
Mona Amini
Attorneys for Plaintiff

Carla F. [Signature]

DATED: 4-6-2022